



October 31, 2006

David Mallory, P.E.  
Manager, Measures Development Section  
Stationary Source Division  
California Air Resources Board  
1001 I Street, 6th Floor  
P.O. Box 2815  
Sacramento, CA 95812

**Re: Consumer Products Rule: Rubber/Vinyl Protectant Category**

Dear Mr. Mallory:

The purpose of this letter is to provide The Clorox Company's interpretation of the current Rubber/Vinyl Protectants category included in the Consumer Products rule.

Clorox, with world headquarters in Oakland, is a manufacturer and marketer of many well-known consumer products, including *Clorox* bleach, *Formula 409* and *Pine-Sol* home cleaning products, *Fresh Step* cat litter, *Kingsford* barbecue products, *Hidden Valley Ranch* salad dressing, *Brita* water filtration systems, *STP* and *Aramco* auto care products, and *Glad* plastic bags, wraps and containers.

The Clorox Company manufactures and sells into California a number of products whose intended use is to clean, shine and protect tires. These products leave behind an appearance enhancing protective substance. These products clearly fall under the regulated product category, "Rubber and Vinyl Protectant".

Please do not hesitate to contact me at 925-425-6674 if we can provide further information. We look forward to working with you.

Sincerely,

A handwritten signature in black ink that reads "Jim McCabe".

Jim McCabe  
Senior Scientist

Cc: Robin Gentz

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